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WT 09-42

Potomac Aviation Technology Corp

David Wartofsky

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Washington, DC 20591

REQUEST FOR FCC INTERPRETATION, OR WAIVER TO FCC 87.71 AND 87.73

When installing and maintaining airport-based Automated Weather Observing Systems (AWOS), FAA currently applies FCC regulations 87.73 and 87.71 to require airports hire scarce and prohibitively-costly contractors who have a General Radiotelephone Operator's License (GROL), merely to be 'present' when their AWOS 'aeronautical transmitter' is first installed, and every time otherwise simple measurements must be taken for ongoing FAA verification. Without apparent benefit, this practice imposes prohibitive costs and procedural impediments, which undermines many smaller community airports' ability to provide critical flight safety information to pilots.

To reduce airport costs, and improve equipment surveillance, PATC developed an FCC licensed VHF voice transmitter (AVIACOM1), which complies with FCC and FAA regulations and requirements for operation on unicom (6A3), which allows a maximum of 10 watts. PATC's transceiver incorporates built-in measurement of transmitter frequency, power, VSWR, and modulation, the results of which are passed remotely by data link to PATC without any physical contact with the transmitter *or its antenna path.* The transceiver is factory-sealed and tamper-proof, offering no field-serviceable components or adjustments. (See attachments).

Within minutes of internal measurements being taken, either periodically on the systems predetermined schedule, or when triggered remotely by PATC, transmitter test results are remotely supervised, observed, and recorded by properly qualified PATC personnel.

FAA's current practice of requiring airports to retain an off-site individual who has a GROL, to be present at the airport when testing is already being performed remotely under PATC supervision by qualified personnel, is duplicative, costly and redundant.

To enable smaller community airports to conduct routine operations in a safer more efficient manner, to reduce public-sector costs, and bring FAA's own current activities into compliance with these FCC regulations, PATC asks FCC for interpretation whether remote transmitter testing and reporting is compliant with these FCC regulations; or alternatively, PATC requests a waiver to this effect.

Sincerely,

David Wartofsky
Potomac Airfield – Potomac Aviation Technology Corp, Fort Washington, MD 20744

R&D Potomac Airfield * 10300 Glen Way * Fort Washington, * MD * 20744 * Tel 301 248 5720 * Fax 301 248 3997
Business Office: 10 Newbury Street * Boston * MA * 02116 * Tel 617 267 6828 * Fax 617 267 6355

Sec. 87.71 Frequency measurements.

A licensed operator must measure the operating frequencies of all land-based transmitters at the following times:

(a) When the transmitter is originally installed;

(b) When any change or adjustment is made in the transmitter which may affect an operating frequency; or

(c) When an operating frequency has shifted beyond tolerance.

DISCUSSION

On airport AWOS systems operate on a discrete vhf frequency under the authority of a *station license*, typically assigned to the airport. A separate GROL is not currently required or necessary for either the station licensee, or the unicom operator (if AWOS operates under 87.219).

'Licensed operator' could be referring to the *station licensee,* who would serve as the licensed operator, responsible for the use of their assigned frequency, as well as any transmitters operating under their authority. The station licensee for airport-based aeronautical transmitters usually has designated the Airport Manager as their agent and representative.

Many years ago, FCC eliminated the requirement for pilots to have a separate FCC license in the USA; perhaps this language predates that legacy?

'Frequencies' could be referring to the multiple frequencies typically necessary for electronic course guidance, such as by ILS, VOR, or others. AWOS use a single vhf voice transmitter on one assigned frequency to make automated voice transmissions to pilots; AWOS do not have multiple frequencies.

Setting the vhf frequency for AWOS no longer requires changing crystals, nor are there any other continuously-variable adjustments that could lead to off-tolerance transmissions, such as trimpots: Frequency is set using clearly marked and detented knobs, switches, buttons, or equivalent; rendering technical skills unnecessary.

Measuring the vhf frequency of for AWOS is routinely performed at airports by listening to the AWOS transmission on another vhf transceiver. Many vhf voice transceivers are commonly available at airports, including most aircraft, hand-held units, or the airport's unicom station. Measuring an AWOS frequency by *listening* to the AWOS on another transceiver requires no GROL.

If somehow a vhf voice transmitter may 'shift' off frequency (extremely rare with modern radios), this represents no safety hazard; the AWOS becomes unavailable to pilots who go to backup procedures.

Vhf voice transmitters do not provide electronic course guidance, rendering their tolerances less critical than transmitters providing electronic course guidance: Minor loss of power, modulation, or VSWR only renders the apparent vhf voice transmission weaker to pilots. Failure to provide the expected services results in the equipment being shut down and repaired.

To address any significant out of tolerance conditions, PATC has the ability to remotely and selectively disable or shut down various components of any SuperAWOS, up to and including shutting down the entire system. 2

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Sec. 87.73 Transmitter adjustments and tests.

A general radiotelephone operator must directly supervise and be responsible for all transmitter adjustments or tests during installation, servicing or maintenance of a radio station. A general radiotelephone operator must be responsible for the proper functioning of the station equipment.

DISCUSSION

Personnel at PATC have obtained all applicable FCC licenses, including GROL, and PATC remotely supervises and is responsible for all transmitter adjustments or tests at all times; including installation, servicing, and maintenance.

PATC's transmitter is factory-sealed and tamper-proof, allowing no field service or adjustments. PATC personnel at the factory are the only persons who can physically perform any maintenance or adjustments on PATC transmitters.

Without internal measurement capability, taking measurements usually requires disassembling a transmitters antenna path to insert test equipment. The antenna path must then be re-assembled correctly to restore the transmitter to service; a process that introduces possible failures. For example, FAA recently commissioned a regular AWOS at Salida, Colorado, but the technical personnel left the site forgetting to re-connect the antenna, leaving the equipment useless. A simple mistake took time, effort, and expense, to restore the equipment to service.

PATC performs all transmitter tests remotely, without any physical contact with the transmitter, without any assembly or dis-assembly of the transmitter or its antenna path; which eliminates the possibility of introducing these types of failures in the field.

The station licensee remains responsible for all aspects of their transmitter station. Using moder technology, PATC provides the station licensee with the technical skills, integrated testing capability, and technical oversight, *at no cost.*

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GENERAL RADIOTELEPHONE OPERATOR LICENSE

General Radiotelephone Operator License (GROL) is required to adjust, maintain, or internally repair FCC licensed radiotelephone transmitters in the aviation, maritime and international fixed public radio services. It conveys all of the operating authority of the MROP.

It is required to operate the following:

- any maritime land radio station or compulsorily equipped ship radiotelephone station operating with more than 1500 watts of peak envelope power;
- voluntarily equipped ship and aeronautical (including aircraft) stations with more than 1000 watts of peak envelope power.

DISCUSSION

Within this definition, there is no GROL required to take external measurements from a sealed transmitter. The PATC transmitter is a factory-sealed unit offering no field serviceable components nor access; no adjustment, maintenance, or internal repair is physically possible in the field.

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PATC – AUTOMATED WEATHER OBSERVING SYSTEM - "SuperAWOS"

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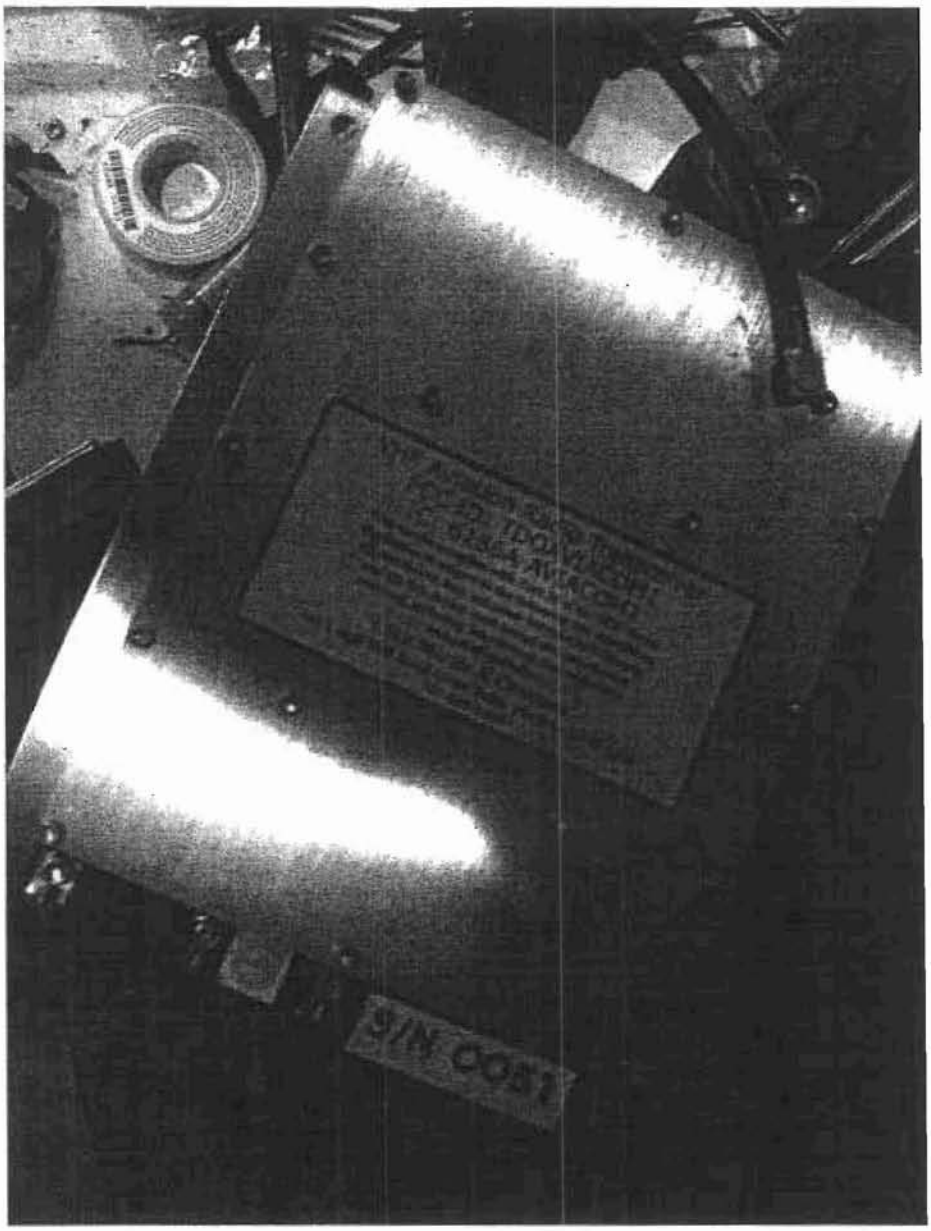
PATC VHF - Aviation Radio Transceiver (FCC ID: 'TDOAVIACOM1')



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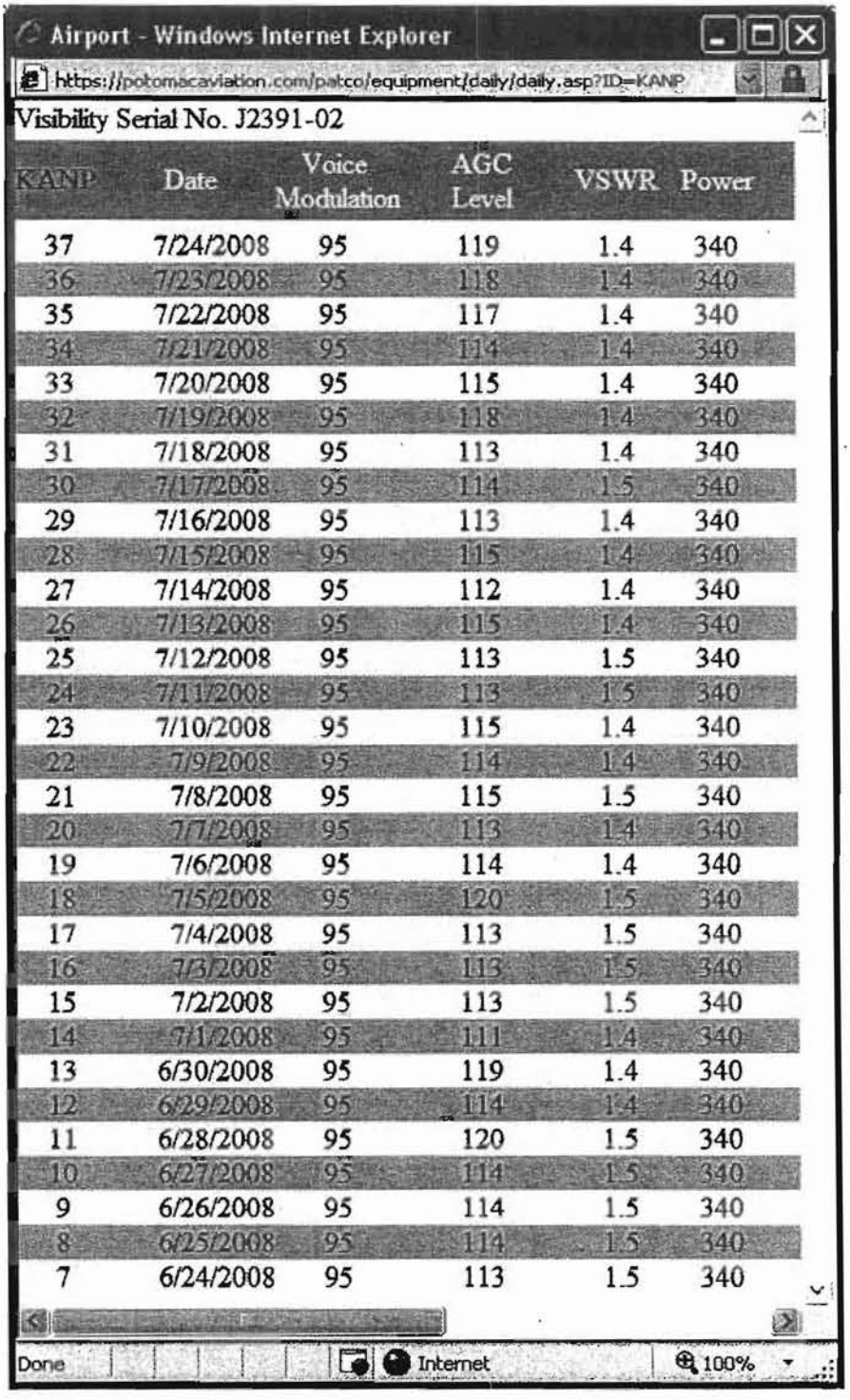
ACTUAL *DAILY* TRANSCEIVER REPORT - Annapolis MD KANP



Visibility Serial No. J2391-02

KANP	Date	Voice Modulation	AGC Level	VSWR	Power
37	7/24/2008	95	119	1.4	340
36	7/23/2008	95	118	1.4	340
35	7/22/2008	95	117	1.4	340
34	7/21/2008	95	114	1.4	340
33	7/20/2008	95	115	1.4	340
32	7/19/2008	95	118	1.4	340
31	7/18/2008	95	113	1.4	340
30	7/17/2008	95	114	1.5	340
29	7/16/2008	95	113	1.4	340
28	7/15/2008	95	115	1.4	340
27	7/14/2008	95	112	1.4	340
26	7/13/2008	95	115	1.4	340
25	7/12/2008	95	113	1.5	340
24	7/11/2008	95	113	1.5	340
23	7/10/2008	95	115	1.4	340
22	7/9/2008	95	114	1.4	340
21	7/8/2008	95	115	1.5	340
20	7/7/2008	95	113	1.4	340
19	7/6/2008	95	114	1.4	340
18	7/5/2008	95	120	1.5	340
17	7/4/2008	95	113	1.5	340
16	7/3/2008	95	113	1.5	340
15	7/2/2008	95	113	1.5	340
14	7/1/2008	95	111	1.4	340
13	6/30/2008	95	119	1.4	340
12	6/29/2008	95	114	1.4	340
11	6/28/2008	95	120	1.5	340
10	6/27/2008	95	114	1.5	340
9	6/26/2008	95	114	1.5	340
8	6/25/2008	95	114	1.5	340
7	6/24/2008	95	113	1.5	340

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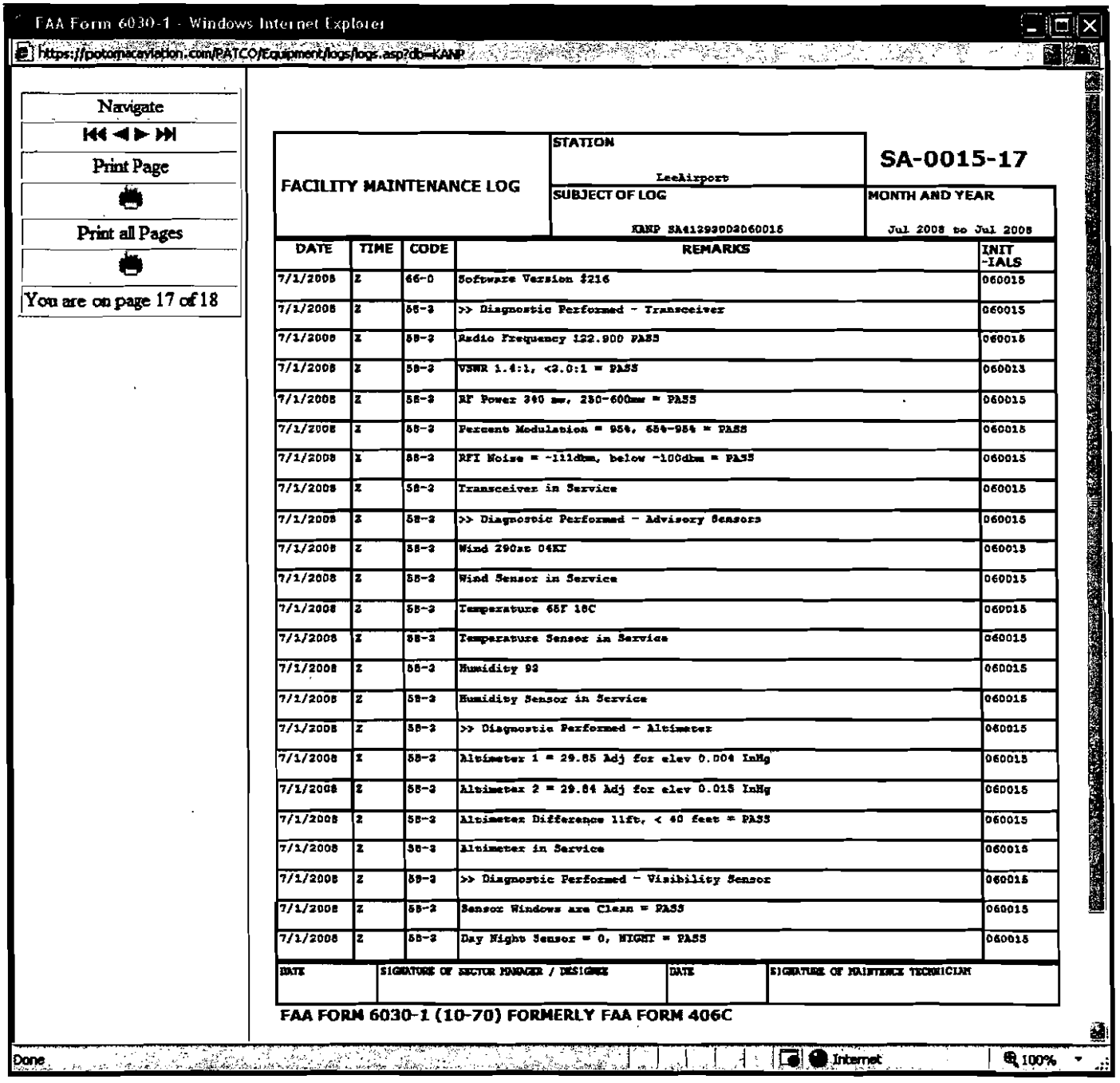
ACTUAL LOGBOOK ENTRY – FROM REMOTE DATA - Annapolis, MD KANP



FAA Form 6030-1 - Windows Internet Explorer

https://potomacaviation.com/PATCO/Equipment/logs/logs.asp?db=KANP

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FACILITY MAINTENANCE LOG	STATION: LeeAirport	SA-0015-17
	SUBJECT OF LOG: KANP SA41293002060015	MONTH AND YEAR: Jul 2008 to Jul 2008

DATE	TIME	CODE	REMARKS	INITIALS
7/1/2008	Z	66-0	Software Version $216	060015
7/1/2008	Z	55-2	>> Diagnostic Performed - Transceiver	060015
7/1/2008	Z	55-2	Radio Frequency 122.900 PASS	060015
7/1/2008	Z	55-2	VSWR 1.4:1, <3.0:1 = PASS	060015
7/1/2008	Z	55-2	RF Power 340 mw, 250-600mw = PASS	060015
7/1/2008	Z	55-2	Percent Modulation = 95%, 65%-95% = PASS	060015
7/1/2008	Z	55-2	RFI Noise = -111dbm, below -100dbm = PASS	060015
7/1/2008	Z	55-2	Transceiver in Service	060015
7/1/2008	Z	55-2	>> Diagnostic Performed - Advisory Sensors	060015
7/1/2008	Z	55-2	Wind 290at 04KT	060015
7/1/2008	Z	55-2	Wind Sensor in Service	060015
7/1/2008	Z	55-2	Temperature 65F 18C	060015
7/1/2008	Z	55-2	Temperature Sensor in Service	060015
7/1/2008	Z	55-2	Humidity 93	060015
7/1/2008	Z	55-2	Humidity Sensor in Service	060015
7/1/2008	Z	55-2	>> Diagnostic Performed - Altimeter	060015
7/1/2008	Z	55-2	Altimeter 1 = 29.85 Adj for elev 0.004 InHg	060015
7/1/2008	Z	55-2	Altimeter 2 = 29.84 Adj for elev 0.015 InHg	060015
7/1/2008	Z	55-2	Altimeter Difference 11ft, < 40 feet = PASS	060015
7/1/2008	Z	55-2	Altimeter in Service	060015
7/1/2008	Z	55-2	>> Diagnostic Performed - Visibility Sensor	060015
7/1/2008	Z	55-2	Sensor Windows are Clean = PASS	060015
7/1/2008	Z	55-2	Day Night Sensor = 0, NIGHT = PASS	060015

DATE	SIGNATURE OF SECTOR MANAGER / DESIGNEE	DATE	SIGNATURE OF MAINTENANCE TECHNICIAN

FAA FORM 6030-1 (10-70) FORMERLY FAA FORM 406C

Done | Internet | 100%

NOTE: Please note correlation between actual and logbook entries.

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445 12th Street SW
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Oscar Alvarez, Manager
FAA Spectrum Engineering
800 Independence Ave SW
Washington, DC 20591

November 12, 2008

PG AIRPARK ASSOC LP (dba POTOMAC AIRFIELD) and POTOMAC AVIATION TECHNOLOGY CORP (PATC) REQUEST FCC INTERPRETATION OR WAIVER TO FCC 87.71 AND 87.73

PG Airpark Assoc LP, dba Potomac Airfield (FAA ID VKX, FCC Unicom Station licensee KBE7), is a small airport in Fort Washington Maryland, which owns and has installed an Automated Weather Observing System (AWOS) made by Potomac Aviation Technology Corp (PATC). This AWOS transmits a variety of safety information to pilots over VHF Unicom, by adaptively sharing spectrum under FCC 87.219, and under authority of the Airport's FCC unicom station license.

Current FAA interpretation of FCC regulations 87.73 and 87.71 would require Potomac Airfield to hire scarce and prohibitively-costly off-site contractors having an FCC General Radiotelephone Operator's License (GROL), merely to be 'present' when the AWOS 'aeronautical transmitter' is first installed, and every time otherwise simple measurements are taken for ongoing equipment verification.

Traditionally, taking transmitter measurements involves qualified personnel be physically present to disassemble the antenna path to insert test equipment, and offers opportunity for inadvertent tampering with the transmitter.

To eliminate these concerns, and to provide better equipment surveillance, PATC's AWOS incorporates internal diagnostics and remote maintenance monitoring which automatically perform all transmitter measurements entirely hands-off. Automatic transmitter tests include frequency, power, modulation, VSWR and more. These tests are performed automatically when the equipment is turned on; under program control every day, can be remotely triggered as needed, and can also be initiated by turning a knob on the AWOS and listening to the results over the system's speaker. The AWOS sends transmitter test results remotely by datalink to PATC, where results are monitored remotely by properly qualified PATC personnel. A physical presence at the AWOS at the airport is unnecessary; there is no need to touch the equipment, and there is no opportunity to tamper with the transmitter.

Current FAA interpretation of these FCC regulations would still impose the prohibitive costs and procedural impediments of requiring someone with a GROL present when the system performs its automated, self-contained, hands off transmitter testing. This is duplicative and unnecessary, and undermines Potomac Airfield's ability to provide critical flight safety information to pilots.

To enable Potomac Airfield to conduct routine operations in a safer more efficient manner, and to reduce costs, Potomac Airfield and PATC ask FCC for interpretation of whether installation of this AWOS and its integral transmitter, under authority of the Airport, which incorporates hands-off remote transmitter testing and reporting, under remote supervision by properly qualified personnel, is compliant with these FCC regulations; or alternatively, PATC requests a waiver to this effect.

Sincerely,

David Wartofsky
Potomac Airfield, Fort Washington, MD 20744, and
Potomac Aviation Technology Corp, Fort Washington, MD 20744

Sec. 87.71 Frequency measurements.

A licensed operator must measure the operating frequencies of all land-based transmitters at the following times:

(a) When the transmitter is originally installed;

(b) When any change or adjustment is made in the transmitter which may affect an operating frequency; or

(c) When an operating frequency has shifted beyond tolerance.

DISCUSSION

On airport AWOS systems operate on a discrete vhf frequency under the authority of a *station license*, typically assigned to the airport. A separate GROL is not currently required or necessary for either the station licensee, or the unicom operator (if AWOS operates under 87.219).

'Licensed operator' could be referring to the *station licensee,* who would serve as the licensed operator, responsible for the use of their assigned frequency, as well as any transmitters operating under their authority. The station licensee for airport-based aeronautical transmitters usually has designated the Airport Manager as their agent and representative.

Many years ago, FCC eliminated the requirement for pilots to have a separate FCC license in the USA; perhaps this language predates that legacy?

'Frequencies' could be referring to the multiple frequencies typically necessary for electronic course guidance, such as by ILS, VOR, or others. AWOS use a single vhf voice transmitter on one assigned frequency to make automated voice transmissions to pilots; AWOS do not have multiple frequencies.

Setting the vhf frequency for AWOS no longer requires changing crystals, nor are there any other continuously-variable adjustments that could lead to off-tolerance transmissions, such as trimpots: Frequency is set using clearly marked and detented knobs, switches, buttons, or equivalent; rendering technical skills unnecessary.

Measuring the vhf frequency of for AWOS is routinely performed at airports by listening to the AWOS transmission on another vhf transceiver. Many vhf voice transceivers are commonly available at airports, including most aircraft, hand-held units, or the airport's unicom station. Measuring an AWOS frequency by *listening* to the AWOS on another transceiver requires no GROL.

If somehow a vhf voice transmitter may 'shift' off frequency (extremely rare with modern radios), this represents no safety hazard; the AWOS becomes unavailable to pilots who go to backup procedures.

Vhf voice transmitters do not provide electronic course guidance, rendering their tolerances less critical than transmitters providing electronic course guidance: Minor loss of power, modulation, or VSWR only renders the apparent vhf voice transmission weaker to pilots. Failure to provide the expected services results in the equipment being shut down and repaired.

To address any significant out of tolerance conditions, PATC has the ability to remotely and selectively disable or shut down various components of any SuperAWOS, up to and including shutting down the entire system.

The station licensee remains responsible for all aspects of their transmitter station. Using moder technology, PATC provides the station licensee with the technical skills, integrated testing capability, and technical oversight, *at no cost*

Sec. 87.73 Transmitter adjustments and tests.

A general radiotelephone operator must directly supervise and be responsible for all transmitter adjustments or tests during installation, servicing or maintenance of a radio station. A general radiotelephone operator must be responsible for the proper functioning of the station equipment.

DISCUSSION

Personnel at PATC have obtained all applicable FCC licenses, including GROL, and PATC remotely supervises and is responsible for all transmitter adjustments or tests at all times; including installation, servicing, and maintenance.

PATC's transmitter is factory-sealed and tamper-proof, allowing no field service or adjustments. PATC personnel at the factory are the only persons who can physically perform any maintenance or adjustments on PATC transmitters.

Without internal measurement capability, taking measurements usually requires disassembling a transmitters antenna path to insert test equipment. The antenna path must then be re-assembled correctly to restore the transmitter to service; a process that introduces possible failures. For example, FAA recently commissioned a regular AWOS at Salida, Colorado, but the technical personnel left the site forgetting to re-connect the antenna, leaving the equipment useless. A simple mistake took time, effort, and expense, to restore the equipment to service.

PATC performs all transmitter tests remotely, without any physical contact with the transmitter, without any assembly or dis-assembly of the transmitter or its antenna path; which eliminates the possibility of introducing these types of failures in the field.

GENERAL RADIOTELEPHONE OPERATOR LICENSE

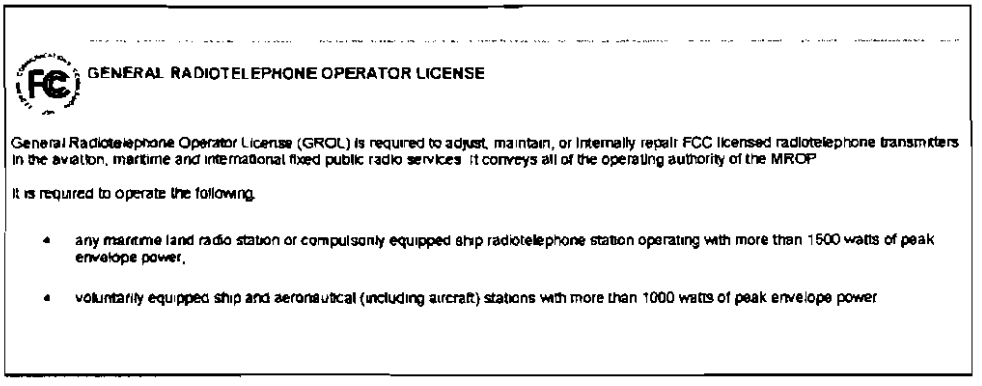
General Radiotelephone Operator License (GROL) is required to adjust, maintain, or internally repair FCC licensed radiotelephone transmitters in the aviation, maritime and international fixed public radio services. It conveys all of the operating authority of the MROP. It is required to operate the following:

any maritime land radio station or compulsorily equipped ship radiotelephone station operating with more than 1500 watts of peak envelope power;

voluntarily equipped ship and aeronautical (including aircraft) stations with more than 1000 watts of peak envelope power.

DISCUSSION

Within this definition, there is no GROL required to take external measurements from a sealed transmitter. The PATC transmitter is a factory-sealed unit offering no field serviceable components nor access; no adjustment, maintenance, or internal repair is physically possible in the field.



GENERAL RADIOTELEPHONE OPERATOR LICENSE

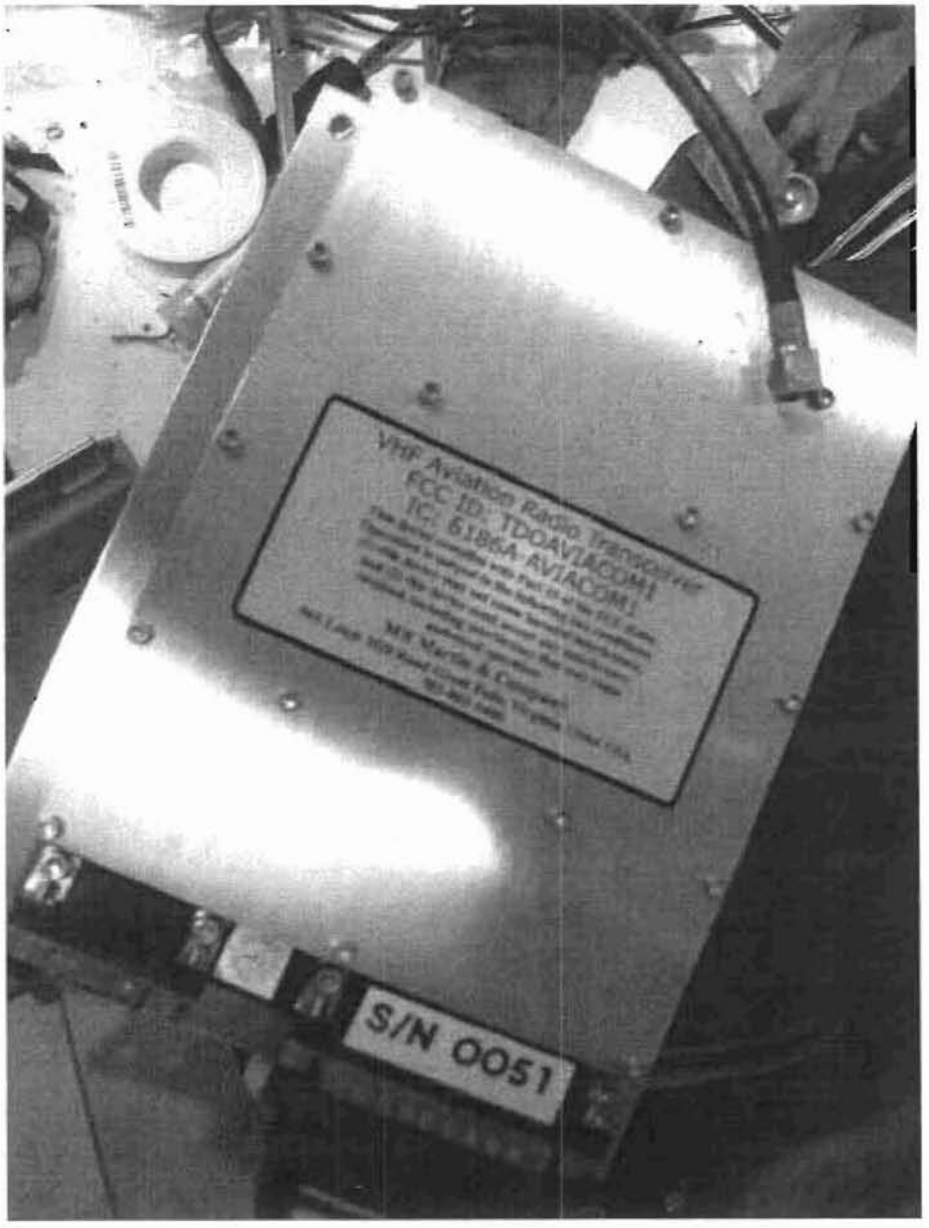
General Radiotelephone Operator License (GROL) is required to adjust, maintain, or internally repair FCC licensed radiotelephone transmitters in the aviation, maritime and international fixed public radio services. It conveys all of the operating authority of the MROP.

It is required to operate the following.

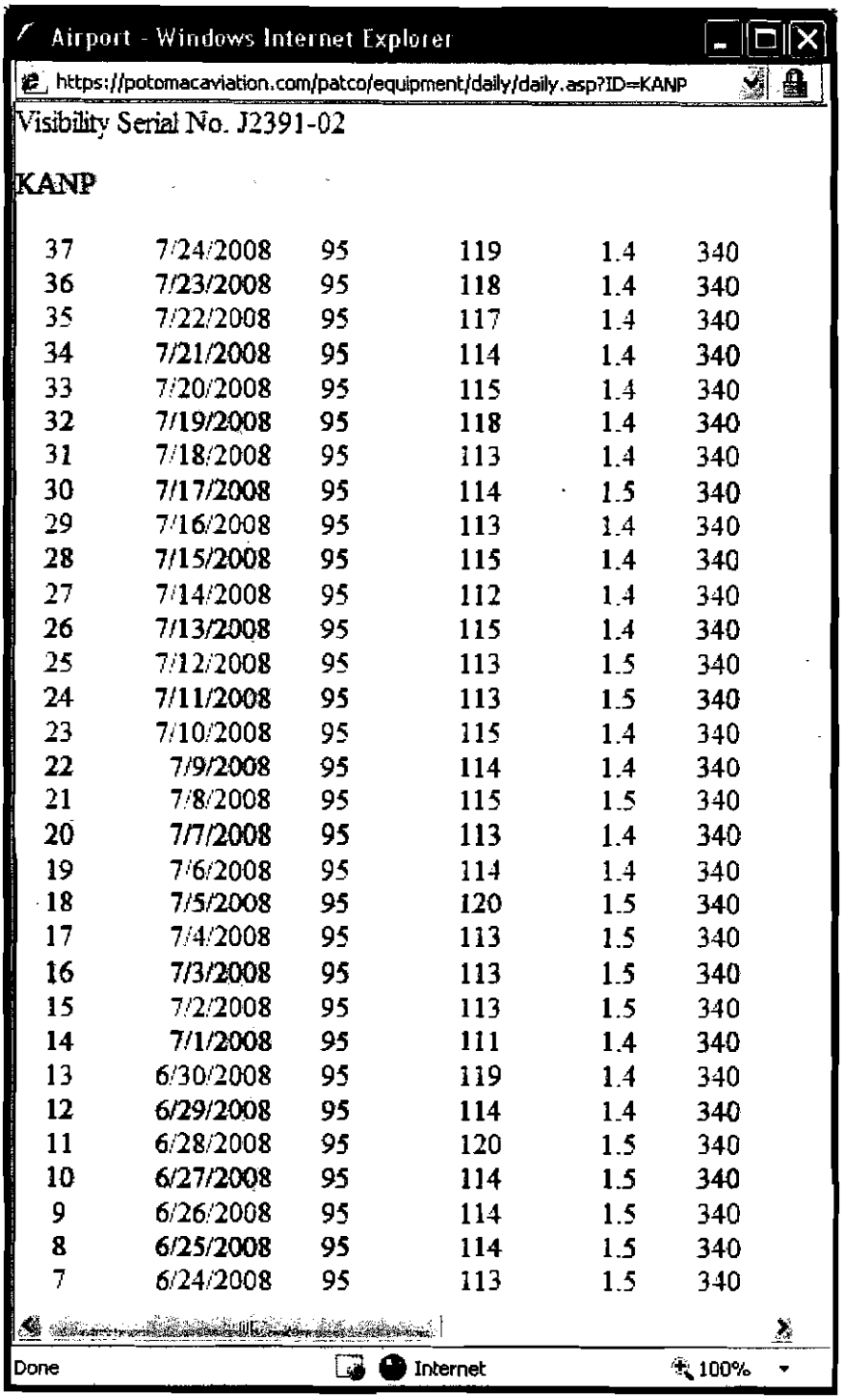
- any maritime land radio station or compulsorily equipped ship radiotelephone station operating with more than 1500 watts of peak envelope power,
- voluntarily equipped ship and aeronautical (including aircraft) stations with more than 1000 watts of peak envelope power

PATC – AUTOMATED WEATHER OBSERVING SYSTEM - "SuperAWOS"

PATC VHF - Aviation Radio Transceiver (FCC ID: 'TDOAVIACOM1')



ACTUAL *DAILY* TRANSCEIVER REPORT - Annapolis MD KANP



Visibility Serial No. J2391-02

KANP

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14	7/1/2008	95	111	1.4	340
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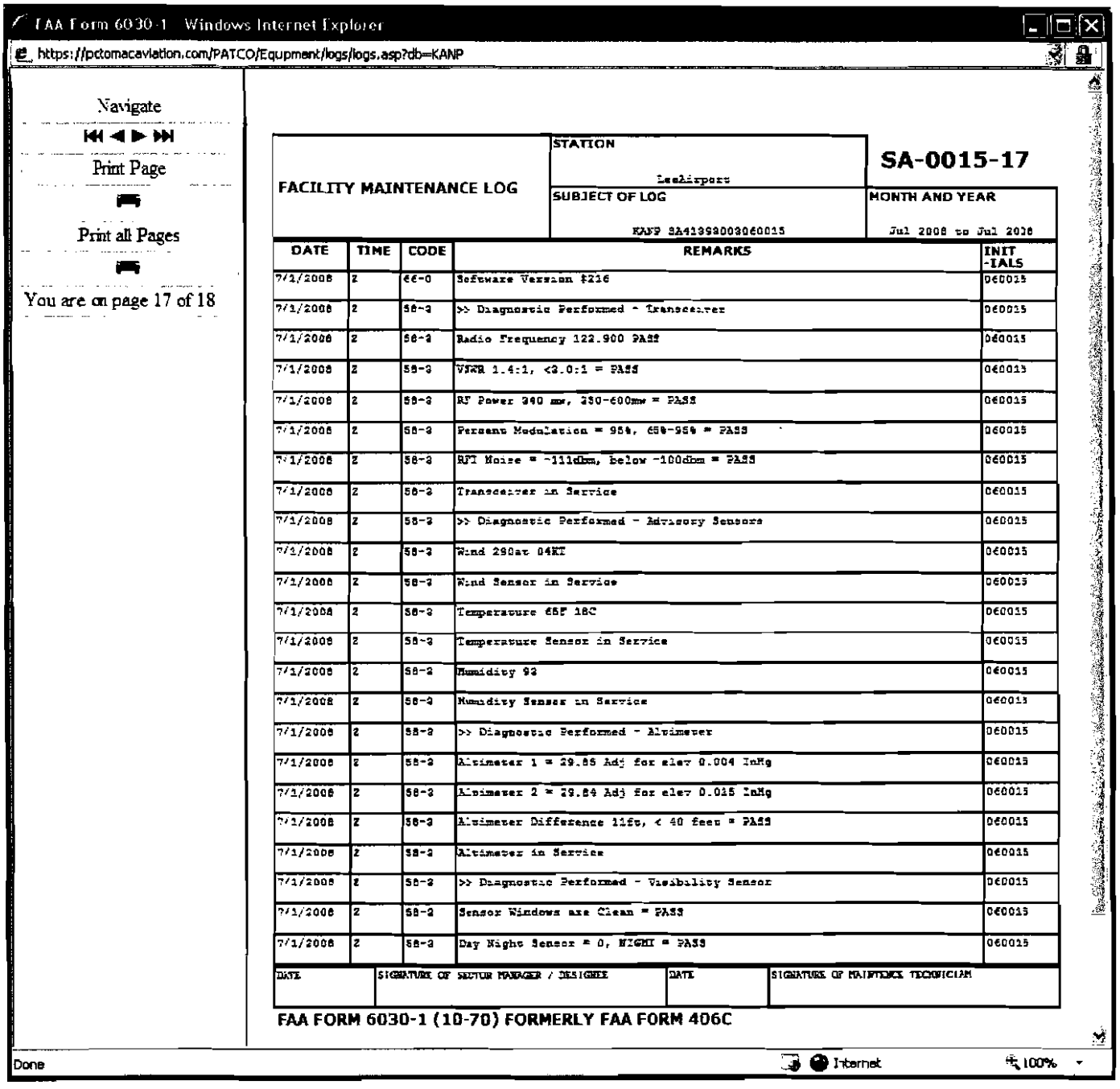
7	6/24/2008	95	113	1.5	340

ACTUAL LOGBOOK ENTRY – FROM REMOTE DATA - Annapolis, MD KANP



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https://pctomacaviation.com/PATCO/Equipment/logs/logs.asp?db=KANP

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FACILITY MAINTENANCE LOG	STATION LeeAirport	SA-0015-17
	SUBJECT OF LOG KANP SA41998003060015	MONTH AND YEAR Jul 2008 to Jul 2008

DATE	TIME	CODE	REMARKS	INITIALS
7/1/2008	Z	66-0	Software Version $216	060015
7/1/2008	Z	58-2	>> Diagnostic Performed - Transceiver	060015
7/1/2008	Z	58-2	Radio Frequency 122.900 PASS	060015
7/1/2008	Z	58-2	VSWR 1.4:1, <3.0:1 = PASS	060015
7/1/2008	Z	58-2	RF Power 340 mw, 250-600mw = PASS	060015
7/1/2008	Z	58-2	Percent Modulation = 95%, 65%-95% = PASS	060015
7/1/2008	Z	58-2	RFI Noise = -111dbm, below -100dbm = PASS	060015
7/1/2008	Z	58-2	Transceiver in Service	060015
7/1/2008	Z	58-2	>> Diagnostic Performed - Advisory Sensors	060015
7/1/2008	Z	58-2	Wind 280at 04KT	060015
7/1/2008	Z	58-2	Wind Sensor in Service	060015
7/1/2008	Z	58-2	Temperature 65F 18C	060015
7/1/2008	Z	58-2	Temperature Sensor in Service	060015
7/1/2008	Z	58-2	Humidity 93	060015
7/1/2008	Z	58-2	Humidity Sensor in Service	060015
7/1/2008	Z	58-2	>> Diagnostic Performed - Altimeter	060015
7/1/2008	Z	58-2	Altimeter 1 = 29.85 Adj for elev 0.004 InHg	060015
7/1/2008	Z	58-2	Altimeter 2 = 29.84 Adj for elev 0.015 InHg	060015
7/1/2008	Z	58-2	Altimeter Difference 11ft, < 40 feet = PASS	060015
7/1/2008	Z	58-2	Altimeter in Service	060015
7/1/2008	Z	58-2	>> Diagnostic Performed - Visibility Sensor	060015
7/1/2008	Z	58-2	Sensor Windows are Clean = PASS	060015
7/1/2008	Z	58-2	Day Night Sensor = 0, NIGHT = PASS	060015

DATE	SIGNATURE OF SECTOR MANAGER / DESIGNEE	DATE	SIGNATURE OF MAINTENANCE TECHNICIAN

FAA FORM 6030-1 (10-70) FORMERLY FAA FORM 406C

Done Internet 100%

NOTE: Please note correlation between actual and logbook entries.

U.S. Department
of Transportation
**Federal Aviation
Administration**

Technical Operations Services

800 Independence Avenue, SW.
Washington, DC 20591

DEC 9 2008

Mr. Scott Stone
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW.
Washington, DC 20554

Dear Mr. Stone:

The Federal Aviation Administration (FAA) is seeking a waiver on requiring a Federal Communications Commission General Radio Telephone Operators License for maintenance of a transmitter that cannot be adjusted or tested except at the factory. In accordance with 47 CFR Part 87.71 a licensed individual must over see the radio installation and any type of maintenance or adjustment for land-based transmitters.

This waiver will only be applicable for the maintenance portion and when the following five (5) criteria has been met:

1. There are no field repairable components
2. The transmitter is a sealed unit.
3. It transmits over the aviation Unicom frequency
4. The transmitter must be approved by the FAA.
5. Installation into the National Airspace was done in accordance with 47 CFR Part 87.71

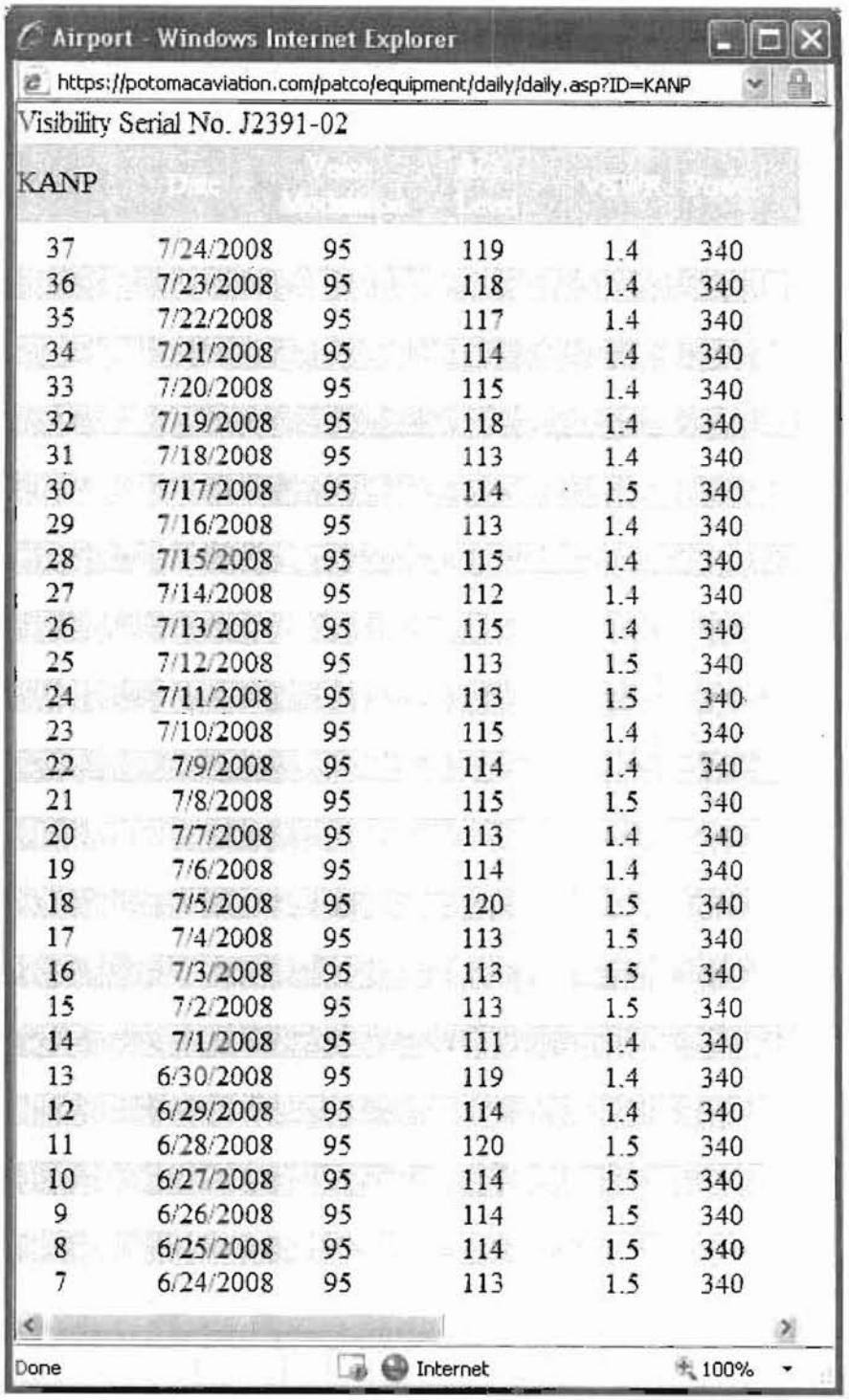
After installation this system becomes part of the annual FAA Non-Fed inspection program.

Please review for the possibility of a waiver of the General Radio Telephone Operators License for operators of the subject transmitter.

Sincerely,

Steven B. Zaidman
Vice President, Technical Operations Services

ACTUAL *DAILY* TRANSCEIVER REPORT - Annapolis MD KANP



Visibility Serial No. J2391-02

KANP					
37	7/24/2008	95	119	1.4	340
36	7/23/2008	95	118	1.4	340
35	7/22/2008	95	117	1.4	340
34	7/21/2008	95	114	1.4	340
33	7/20/2008	95	115	1.4	340
32	7/19/2008	95	118	1.4	340
31	7/18/2008	95	113	1.4	340
30	7/17/2008	95	114	1.5	340
29	7/16/2008	95	113	1.4	340
28	7/15/2008	95	115	1.4	340
27	7/14/2008	95	112	1.4	340
26	7/13/2008	95	115	1.4	340
25	7/12/2008	95	113	1.5	340
24	7/11/2008	95	113	1.5	340
23	7/10/2008	95	115	1.4	340
22	7/9/2008	95	114	1.4	340
21	7/8/2008	95	115	1.5	340
20	7/7/2008	95	113	1.4	340
19	7/6/2008	95	114	1.4	340
18	7/5/2008	95	120	1.5	340
17	7/4/2008	95	113	1.5	340
16	7/3/2008	95	113	1.5	340
15	7/2/2008	95	113	1.5	340
14	7/1/2008	95	111	1.4	340
13	6/30/2008	95	119	1.4	340
12	6/29/2008	95	114	1.4	340
11	6/28/2008	95	120	1.5	340
10	6/27/2008	95	114	1.5	340
9	6/26/2008	95	114	1.5	340
8	6/25/2008	95	114	1.5	340
7	6/24/2008	95	113	1.5	340